

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO AMERICAN POSTAL WORKERS UNION INTERROGATORY
(APWU/USPS-33)**

The United States Postal Service hereby files an institutional response to the above-identified interrogatory of the American Postal Workers Union, dated April 6, 2012. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Kevin Calamoneri
Managing Counsel
Corporate and Postal Business Law

Daniel J. Foucheaux
Chief Counsel, Pricing & Product Support

Kenneth N. Hollies
Attorney

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3083; Fax -3084
May 1, 2012

RESPONSE OF UNITED STATES POSTAL SERVICE
TO APWU INTERROGATORY

APWU/USPS-33. Has the Postal Service performed analytical work to evaluate the size and scope of the competitive market for small parcels?

- a) If so, does that analysis include both B to C and B to B market size analysis?
- b) Please provide the analysis of the size of the overall parcel market.

RESPONSE:

Yes. See USPS-LR-N2012-1/NP24.